

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

ROCKWELL AUTOMATION  
TECHNOLOGIES, INC.,

*Plaintiff,*

v.

SECURE CROSSING RESEARCH  
AND DEVELOPMENT INC.,

*Defendant.*

Case No. 2:12-cv-10274-GCS-MKM

Honorable George Caram Steeh

Referred to Honorable Mona K  
Majzoub

[Oral Argument Requested]

**DECLARATION OF LISA SCHAPIRA IN SUPPORT OF ROCKWELL AUTOMATION  
TECHNOLOGIES, INC'S RESPONSE TO DEFENDANT'S MOTION FOR A  
SUPPLEMENTAL PROTECTIVE ORDER**

I, Lisa Schapira, declare as follows:

1. I am an associate with the law firm of Chadbourne & Parke LLP, counsel to Plaintiff Rockwell Automation Technologies, Inc. ("Rockwell") in this action. I make this declaration based on personal knowledge and in support of Rockwell's Response to defendant Secure Crossing Research and Development Inc's ("Secure Crossing") Motion for a Supplemental Protective Order.

2. On April 24, 2012, Rockwell served Secure Crossing with document and interrogatory requests. Secure Crossing's responses to these Requests were due on May 28, 2012. Despite making repeated inquiries regarding these Requests, no responses were received on May 28, 2012. On July 19, 2012, Secure Crossing produced approximately 70 documents, most of where were publically available.

3. On June 1, 2012, Secure Crossing produced a handful of documents. SCR0001-SCR0599). This production consisted of: an introductory summary of Secure Crossing and its product, a white paper, an advertisement for the Zenwall product, a quick start guide and Zenwall user manual, and materials provided to the Patent and Trademark Office as part of its request for reexamination of the 7,990,967 Patent. Secure Crossing did not produce design and development specifications or source code detailing how the various features and functions of the accused products operate.

4. Attached hereto as Exhibit 1 is a true and correct copy of May 11, 2012 Case Management Order (Docket 22).

5. Attached hereto as Exhibit 2 is a true and correct copy of the transcript of the tutorial hearing held on June 21, 2012.

6. Attached hereto as Exhibit 3 is a true and correct copy of the deposition transcript of Randall Reeves that occurred on May 31, 2012.

7. Attached hereto as Exhibit 4 is a true and correct copy of a July 19, 2012 email exchange between A. Weintraub and L. Schapira. Counsel for Secure Crossing never provided a proposed supplemental protective order and instead filed a motion for a supplemental protective order later on July 19, 2012.

8. Attached hereto as Exhibit 5 is a true and correct copy of Stipulated Protective Order entered by the Court on May 31, 2012 (Docket 30).

9. Attached hereto as Exhibit 6 is a true and correct copy of a revised protective order that creates an "Outside Attorneys Eyes Only" designation.

I declare under the penalty of perjury under the law of the United States that the foregoing is true and correct.

Dated: August 6, 2012

/s/ Lisa Schapira  
Lisa Schapira  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of August, 2012 a copy of the foregoing was electronically filed with the Clerk of the Court using the ECF system which will send notification of such filing to the attorneys of record.

Dated: August 6, 2012

/s/ Lisa Schapira

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ROCKWELL AUTOMATION TECHNOLOGIES, INC.**